

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

PROSERV REMOVAL, INC., on behalf
of itself and all others similarly
situated,

Plaintiff(s),

v.

CRYSTEEL MANUFACTURING, INC.

Defendant(s).

Case No. 0:21-cv-00200 (SRN/ECW)

CLASS ACTION

**STIPULATION EXTENDING
DEFENDANT'S TIME TO
RESPOND TO THE CLASS ACTION
COMPLAINT**

WHEREAS, on January 27, 2021, Proserv Removal, Inc. ("Proserv") filed a Class Action Complaint ("Complaint") against Defendant Crysteel Manufacturing, Inc. ("Crysteel") (ECF 1);

WHEREAS, Proserv served the Complaint via process server on January 29, 2021;

WHEREAS, Crysteel's answer or motion was due February 19, 2021;

WHEREAS, Crysteel sought Proserv's consent to extend time to file an answer or motion, and pursuant to Order (ECF 14), a twenty-one (21) day extension was granted setting the deadline as March 12, 2021;

WHEREAS, to facilitate discussions in an effort to resolve the matter, the parties stipulated to a thirty (30) day extension of time for Crysteel to respond to

the Complaint (ECF 15), and the Court granted the extension on March 15, 2021, extending the deadline to April 12, 2021 (ECF 17);

WHEREAS, the parties are still engaging in good faith discussion to resolve this dispute, and have started to informally exchange information to facilitate settlement;

WHEREAS, to give the parties additional time to discuss settlement and exchange information, the parties agree to extend Cysteel's response deadline by seventy-five (75) days; and,

NOW, THEREFORE, good cause having been shown, the parties, by their respective counsel, hereby stipulate and agree to extend Crysteel's response deadline by seventy-five (75) days, or until June 28, 2021.

Dated: April 9, 2021

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/ Karen Hanson Riebel

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Dated: April 9, 2021

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